

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

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)	
Elimination of Part 23)	IB Docket No. 05-216
of the Commission's Rules)	
)	
2000 Biennial Regulatory Review --)	
Streamlining and Other Revisions of)	
Part 25 of the Commission's Rules)	
Governing the Licensing of, and)	IB Docket No. 00-248
Spectrum Usage by, Satellite Network)	
Earth Stations and Space Stations)	

COMMENTS OF PANAMSAT CORPORATION

PanAmSat Corporation ("PanAmSat"), by its attorneys, hereby comments on the Commission's Notice of Proposed Rulemaking ("NPRM") in the above-captioned proceeding.¹ The Commission has requested comment in the NPRM, among other things, as to the frequencies on which licensees in the International Fixed Public Radiocommunication Services ("IFPRS") will be permitted to operate in the future.² For the reasons stated below, PanAmSat proposes that the Commission confine the continued application of its rules covering IFPRS facilities in the C-band³ to the limited number of systems that remain in operation in a few Caribbean islands, grandfathering these systems, but permitting no other.

PanAmSat initially made this same proposal in a proceeding in which the Commission proposed to implement domestically actions that had been taken at

¹ *Notice of Proposed Rulemaking and Seventh Report and Order*, IB Docket Nos. 05-216 and 00-248, FCC 05-130 (June 24, 2005).

² NPRM 6.

³ As used in these comments, the term "C-band" refers to the 3700-4200 MHz and 5925-6425 MHz bands.

various World Radiocommunication Conferences.⁴ At the time, the Commission determined that PanAmSat's proposal was beyond the scope of the proceeding.⁵ Now that the Commission has initiated a proceeding in which it has squarely raised the issue of IFPRS frequencies, PanAmSat is renewing its proposal.

The IFPRS service has atrophied because undersea cables and satellite links have replaced terrestrial radio for international calling.⁶ IFPRS operations in the C-band are confined to a limited number of vestige systems in the Caribbean islands, and the Commission has acknowledged that "new IFPRS facilities are unlikely to be required in C-band."⁷ In sum, the use of C-band frequencies by IFPRS stations is an idea whose time has come and gone.

There is a price to be paid for continuing to make C-band frequencies available for IFPRS purposes when there is no demand for IFPRS use. C-band frequencies are sorely needed by the fixed satellite service ("FSS"), and even the theoretical possibility of IFPRS systems in the band can complicate the planning and coordination of FSS services. FSS systems should not be subjected to this burden just to preserve spectrum options for a service that has become obsolete.

The Commission previously suggested it did not want to "foreclose the opportunity for additional use of this [IFPRS] service in remote island areas if it is required."⁸ There is no evidence, however, that there is or ever will be such a need; all the evidence points in the opposite direction. In any event, at most the Commission's statement would warrant permitting a limited expansion of IFPRS operations in those remote areas where C-band IFPRS operations currently exist.

⁴ See Comments of PanAmSat, ET Docket No. 02-305 and RM-10331 (Feb. 10, 2003).

⁵ *Report and Order*, ET Docket No. 02-305 and RM-10331, FCC 03-269 (Nov. 4, 2003), ¶ 71.

⁶ *Notice of Proposed Rulemaking*, ET Docket No. 02-305 and RM-10331, FCC 02-261 (Oct. 7, 2002), ¶ 103 n. 144.

⁷ *Report and Order*, ET Docket No. 02-305 and RM-10331, FCC 03-269 (Nov. 4, 2003), ¶ 71.

⁸ *Id.*

Accordingly, and for the reasons stated herein, the Commission should eliminate the use of C-band frequencies by IFPRS stations, except that it should grandfather stations that have already been licensed.

Respectfully submitted,

PANAMSAT CORPORATION

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October 28, 2005